

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE MIDDLE DISTRICT OF PENNSYLVANIA**

IN RE:

WILLIAM H. FITZGERALD

Debtor

THE BANK OF NEW YORK

Movant

v.

WILLIAM H. FITZGERALD

Respondent

Case No. 5-17-04313

Chapter 13

John J. Thomas, B.J.

**DEBTOR'S REPLY TO MOTION FOR RELIEF OF THE BANK OF NEW
YORK**

AND NOW, comes the Debtor herein by and through his attorney, Brian E. Manning Esquire, and files the following Reply to the Motion for Relief and in support thereof alleges :

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted.
5. Admitted.

6. After reasonable investigation the answering party is without sufficient knowledge or information to for a belief as to the truth of the allegations in the corresponding paragraph of the Motion. Said allegations are therefore denied, and strict proof thereof is demanded at the time of hearing.

7. After reasonable investigation the answering party is without sufficient knowledge or information to for a belief as to the truth of the allegations in the corresponding paragraph of the Motion. Said allegations are therefore denied, and strict proof thereof is demanded at the time of hearing.

8. Admitted.

9. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.

10. After reasonable investigation the answering party is without sufficient knowledge or information to for a belief as to the truth of the allegations in the corresponding paragraph of the Motion. Said allegations are therefore denied, and strict proof thereof is demanded at the time of hearing.

11. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.

12. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.

13. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.

14. After reasonable investigation the answering party is without sufficient knowledge or information to for a belief as to the truth of the allegations in the corresponding paragraph of the Motion. Said allegations are therefore denied, and strict proof thereof is demanded at the time of hearing.

15. Denied as Stated. Strict proof thereof is demanded at the time of hearing or trial.

16. No grounds have been stated to warrant the waiver of Bankruptcy Rule 4001(a)(3).

WHEREFORE, the Debtor respectfully requests that this Court enter an order denying the Motion for Relief without prejudice and granting the Debtor such other and further relief as the Court deems just and appropriate under the circumstances.

Respectfully Submitted
Law Offices of Brian E. Manning
/s/ Brian E. Manning
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Dated: July 6, 2018